

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

CORTEZ D. BROWN, DEONTAE TATE,
and **JEREMY S. MELTON** on behalf of
themselves and all similarly situated persons,

Plaintiffs,

v.

Civil Action No.: 2:17-cv-02015
Jury Demanded

BILL OLDHAM, in his individual capacity
and in his official capacity as the Sheriff of
Shelby County, Tennessee; **ROBERT**
MOORE, in his individual capacity and in
his official capacity as the Jail Director of
the Shelby County, Tennessee; **CHARLENE**
McGHEE, in her individual capacity and in
her official capacity as the of Assistant Chief
Jail Security of Shelby County, Tennessee;
DEBRA HAMMONS, in her individual
capacity and in her official capacity as the
Assistant Chief of Jail Programs of Shelby
County, Tennessee; **SHELBY COUNTY,**
TENNESSEE, a Tennessee municipality;
and **TYLER TECHNOLOGIES, INC.**, a
foreign corporation,

Defendants.

DEFENDANTS SHERIFF BILL OLDHAM, ROBERT MOORE, CHARLINE
MCGHEE, DEBRA HAMMONS, SHELBY COUNTY, TENNESSEE AND TYLER
TECHNOLOGIES, INC.'S COMBINED JOINT MOTION AND SUPPORTING
MEMORANDUM FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE
RESPOND TO THE COMPLAINT

Defendants Sheriff Bill Oldham, Robert Moore, Charline McGhee, Debra Hammons,
Shelby County, Tennessee and Tyler Technologies, Inc. pursuant to FED. R. CIV. P. 6 and 12 and

other applicable provisions of law, move the Court to extend to March 8, 2017, their time to answer or otherwise respond to the Class Action Complaint (“Complaint”) filed by Plaintiffs. In support of their Motion, Defendants state as follows:

MEMORANDUM OF FACTS AND LAW IN SUPPORT OF MOTION

1. Defendants Sheriff Bill Oldham, Robert Moore, Charline McGhee, Debra Hammons and Shelby County, Tennessee’s deadline to answer or file a responsive pleading to Plaintiffs’ complaint is February 7, 2016.

2. Defendant Tyler Technologies, Inc.’s deadline to answer or file a responsive pleading to Plaintiffs’ complaint is February 3, 2107.

3. This is a complex class action lawsuit filed on behalf of the Plaintiffs.

4. Shelby County, Tennessee retained Wyatt, Tarrant & Combs, LLC (“Wyatt”) on January 13, 2017 to represent the Defendants Sheriff Bill Oldham, Robert Moore, Charline McGhee, Debra Hammons and Shelby County, Tennessee.

5. Tyler Technologies, Inc. retained Baker Donelson, Bearman, Caldwell & Berkowitz (“Baker”) on January 23, 2017 to represent its interest.

6. Additional time is needed for Wyatt and Baker to discuss this matter with their client(s) and obtain a full understanding of the facts.

7. Additional time is needed for Wyatt and Baker to review and analyze the Plaintiffs’ allegations in this lawsuit.

8. Pursuant to Local Rule 7.2(a)(1)(B), counsel for Defendants consulted with Plaintiffs’ counsel regarding this extension.

9. Plaintiffs' counsel does not oppose the Defendants' Request for Extension of Time.

10. This is the Defendants' First Request for Extension of Time.

11. A proposed Order granting the Motion will be e-mailed to the Court for its consideration.

Therefore, Defendants Sheriff Bill Oldham, Robert Moore, Charline McGhee, Debra Hammons and Shelby County, Tennessee and Tyler Technologies, Inc. respectfully request that the Court extend to March 8, 2017, their time to answer or otherwise respond to the Complaint filed by the Plaintiffs.

Respectfully submitted,

/s/Odell Horton, Jr.

Odell Horton, Jr. (# 12426)

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ATTORNEY FOR DEFENDANTS

Sheriff Bill Oldham, Robert Moore, Charline McGhee, Debra Hammons and Shelby County, Tennessee

/s/Bradley E. Trammell

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ATTORNEY FOR DEFENDANT
Tyler Technologies, Inc.

CERTIFICATE OF SERVICE

The foregoing document was filed via the Court's CM/ECF system, automatically effecting service on counsel of record for all other parties to this action, on this 27th day of January, 2017.

/s/Odell Horton, Jr.

Odell Horton, Jr.

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